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May 19, 2023

Hon. Valerie E. Caproni  
United States District Judge  
Southern District of New York  
US Courthouse  
40 Foley Square  
New York, NY 10007

Via ECF and email to [CaproniNYSDChambers@nysd.uscourts.gov](mailto:CaproniNYSDChambers@nysd.uscourts.gov)

Re: United States v. Joseph Jeffries  
15 Cr. 537 (VEC)

Dear Judge Caproni:

We represent the defendant Joseph Jeffries in this Violation of Supervise Release (VOSR) proceeding. The matter is presently scheduled for a conference on May 25, 2023.

The purpose of this letter is to request that the Court enter an order granting the defendant bail on consent of the Government per AUSA Jeffrey Coyle (212) 637-2437 (office) (646 887-7229 (cell). AUSA Coyle has learned from the Bronx Assistant District Attorney prosecuting the underlying State gun possession case upon which the VOSR is based that the results of the DNA test performed on the gun are negative for the DNA of the defendant, and that the State case is likely to be dismissed as a result. The defendant's term of Supervised Release otherwise expired in January.

The defendant is out on \$20,000.00 bail in the State case, secured by \$2000.00 in cash by his mother, Deborah Jeffries, who works for Allied Universal Security Services as a security supervisor in a homeless shelter. Therefore, we are proposing that the Court order the defendant be released in the case before Your Honor on a \$20,000.00 Personal Recognizance Bond secured by the signature of his mother, plus Pretrial Services Supervision and travel limited to the Southern District of New York. I am informed by AUSA Coyle that if the Government seeks additional conditions, it will do so in response to this letter.

Please have Chambers contact me if there are any questions or concerns.

Very truly yours,  
*Bennett M. Epstein*  
Bennett M. Epstein

cc. Jeffrey.Coyle@usdoj.gov

Application GRANTED. Mr. Jeffries should be released on the conditions proposed by Defendant, without prejudice to the Government requesting additional conditions.

SO ORDERED.



Date: 5/19/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE